REMARKS

Claims 1-8 were presented for examination. The instant amendment cancels claims 1, 5, and 6 without prejudice and adds new claims 9-17. Thus, claims 2-4 and 7-17 are pending upon entry of the instant amendment. Claims 4, 8, 9, and 16 are independent.

Claims 1-3 and 5-7 were rejected under 35 U.S.C. §102(b) over U.S. Patent No. 5,932,935 to Clifton et al. (Clifton).

Applicants respectfully maintain the traversal of these rejections.

Specifically, Applicants maintain that the primary power source (typically from a power company) and the standby power source 988 (standby diesel generator) of Clifton can simply not *reasonably* be considered to disclose or suggest the "field excitation supply units" of claims 1, 4, and 5, which are terms of art in the field of synchronous motors.

None-the-less, and merely in the interest of expediting prosecution, claims 4 and 8, which have been indicated as containing allowable subject matter, have been amended into independent format to obviate these rejections.

More specifically, claim 4 has been amended to include elements of base claim 1, which has been cancelled without prejudice. Claims 2-3 have been amended to depend from claim 4 and not cancelled claim 1.

Similarly, claim 8 has been amended to include elements of base claim 6, which has been cancelled without prejudice. Claim 7 has been amended to depend from claim 8 and not cancelled claim 6.

Accordingly, claims 2-4 and 7-8 are in condition for issuance.

New claims 9-17 have been added to point out various aspects of the present application. Support for new claims 9-17 can be found at least in original claims 1-8, as well as in the specification at paragraphs [0009] to [0012] and [0015] to [0018]. No new matter is added.

Claims 9-17 are believed to be in condition for allowance.

For example, independent claim 9 recites, pertinent part, "a first synchronous motor including a first field winding system", "a second synchronous motor including a second field winding system", and "a standby field excitation supply unit being in selective electrical communication with said first field winding system or said second field winding system".

As indicated by the Examiner in the Office Action dated October 5, 2005, the prior art does not disclose one standby field supply unit that is shared by a plurality of synchronous motors. Accordingly, claim 9, as well as claims 10-15 that depend therefrom, are allowable over the cited art.

Independent claim 16 recites, in pertinent part, "a normal field excitation supply unit" and "a standby field excitation supply unit".

The Office Action asserted, with respect to original claims 1-8, that these same elements are disclosed by Clifton. Applicants respectfully maintain the traversal of this assertion.

Claims are to be given their broadest ***reasonable interpretation***, but the interpretation **must be consistent with the description of the invention in the specification**. *In re Zletz,* 893 F.2d 319, 321, 13 USPQ2d 1320, 1322 (Fed. Cir. 1989).

The Office Action asserts that the power from "IN" in Figure 15 of Clifton is a "normal field excitation supply unit" and the "standby power source 988" of Clifton is "standby field excitation supply unit".

Applicants maintain that such an interpretation of the claimed "field excitation supply units" is simply unreasonable as it is not consistent with the given the description of the invention in the specification.

Rather, Applicants maintain that in the field of synchronous motors, as claimed by the present application, the claimed "field excitation supply units" are devices known to those skilled in the art. More specifically, Applicants submit that it is recognized that "excitation systems" such as the claimed "field excitation supply units" refer, in the field of synchronous motors, to the means of providing field excitation voltage for the synchronous machine.

Thus, Applicants submit that merely applying line power from "IN" in Figure 15 of Clifton or the standby power source 988 would not result in flywheel device 100 operating as a synchronous machine absent some other means of providing the necessary field excitation voltage.

In fact, the present application discloses that "[W]hen a synchronous motor loses its field excitation supply, it is either shut down or is operated in an asynchronous mode for the time that it takes to repair the field excitation supply." See paragraph [0002].

Moreover, Clifton itself discloses that flywheel device 100, when driven as a three-phase motor includes three additional sensors 184, 186 and 188. Here, all armatures of a group are driven whenever the sensors sense that an entire left leg is covered by one of teeth 14 (assuming that the teeth are rotating from left to right past sensors 184, 186 and 188 across the armature coils (as shown in FIG. 5)). In this manner, each phase is driven, in sequence, to continue to drive the rotor about its is axis. See col. 11, lines 1-16. Thus, even Clifton *itself* recognizes that some more than

just power from "IN" or "standby power source 988" is needed in order to operate flywheel device 100 synchronously. Namely the power must be applied in a manner, namely via a field exciter, to drive the armatures in sequence.

In view of the above, Applicants maintain that the power from "IN" or "standby power source 988" does not disclose or suggest the "a normal field excitation supply unit" and "a standby field excitation supply unit" of claim 16.

Furthermore, claim 16 recites that the normal field excitation supply unit supplies "a normal field excitation voltage, said normal field excitation voltage being sufficient to operate said first synchronous motor synchronously", while the standby field excitation supply unit supplies "a standby field excitation voltage, said standby field excitation voltage being sufficient to operate said first synchronous motor synchronously".

Applicants submit that the voltage provided by "IN" or "standby power source 988" in Clifton does not disclose or suggest the "normal field excitation voltage" or the "standby field excitation voltage" both of which are "sufficient to operate said first synchronous motor synchronously".

Accordingly, claim 16, as well as claim 17 that depends therefrom, are allowable over the cited art.

In view of the above, it is respectfully submitted that the present application is in condition for allowance. Such action is solicited.

If for any reason the Examiner feels that consultation with Applicants' attorney would be helpful in the advancement of the prosecution, the Examiner is invited to call the telephone number below.

Respectfully submitted,

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